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April 26, 2004

Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Attention: Chemical Right-to-Know Program

Via e-mail: oppt.ncic@epa.gov
chem.rtk@epa.gov

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I am writing in response to the recent letter from Mr. Charles Auer, Director of the Office of Pollution Prevention and Toxics, regarding the U.S. HPV Challenge Program. Our company has contributed to the recognized success of this program by volunteering to sponsor 32 high production volume chemicals and we continue to work on fulfilling all of our commitments.

The letter requested an update on the status of Solutia's commitment regarding the following three chemicals:

1,6-hexanediamine, N,N,N',N'-tetrabutyl CAS No. 27090-63-7
1,6-hexanediaminium, N,N,N',N'-tetrabutyl-N,N'-diethyl-, bis(ethyl sulfate) CAS No. 68052-49-3
1,6-hexanediaminium, N,N,N',N'-tetrabutyl-N,N'-diethyl-, dihydroxide CAS No. 111960-92-0

We are in the process of completing our robust summaries and test plans. Our initial evaluation revealed few specific data but, through the use of Structure Activity Relationships, we are attempting to build credible relationships between these materials and materials with known toxicological properties. This approach is consistent with the EPA guidance to use all available information to adequately identify hazards while minimizing the use of large numbers of experimental animals. However, this effort has placed unexpected burdens on the data collection and analysis phase of our HPV program for these chemicals. We continue to make significant progress and are committed to delivering high-quality Test Plans and Robust Summary sets to the EPA before the end of the third quarter of this calendar year.

I hope this addresses your concerns. If you have further questions about Solutia's participation in the Challenge Program, please do not hesitate to contact me.

Regards,

Donald A. Lederer, CHMM
Product Stewardship Manager
HPV Coordinator